HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time) OBJECTION DEADLINE: March 30, 2015 at 4:00 p.m. (Eastern Time) EXTENSION GRANTED TO: April 1, 2015 at 4:00 p.m. (Eastern Time)

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Attorneys for United Technologies Corporation

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No. :

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP) :

Debtors. : (Jointly Administered)

## JOINDER OF UNITED TECHNOLOGIES CORPORATION TO THE OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND CITADEL EQUITY FUND LTD. TO THE MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE

United Technologies Corporation, by and through its undersigned counsel, hereby joins in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. (the "Citadel Objection to the Motion") filed to the Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the "Motion"), as follows:

## **OBJECTION AND JOINDER**

United Technologies Corporation and the Debtors were parties to certain derivative contracts.

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1. United Technologies Corporation hereby joins and incorporates by reference the arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. in the Citadel Objection to the Motion [Docket 49030].

WHEREFORE, for the foregoing reasons, United Technologies Corporation respectfully requests that this Court deny the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York March 31, 2015

SCHLAM STONE & DOLAN LLP

By: <u>s/ Bennette D. Kramer</u>

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